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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ELIZABETH CROWN, individually and on
behalf of all others similarly situated,

Plaintiff,

vs.

HCA HEALTHCARE, INC. and DOES I through
10, inclusive,

Defendant.

Case No. 2:23-cv-01871

**STIPULATION AND ORDER TO
EXTEND DEFENDANT’S TIME TO
RESPOND TO THE COMPLAINT
(FIRST REQUEST)**

Plaintiff Elizabeth Crown (“Plaintiff”) and Defendant HCA Healthcare, Inc. (“HCA” or
“Defendant”) as follows:

1. On September 15, 2023, Plaintiff filed a putative class action complaint
 (“Complaint”) against HCA in the Eighth Judicial District Court for the State of Nevada.
2. On November 14, 2023, HCA removed this action to this Court. (ECF No. 1.)
3. HCA’s current deadline to move, answer, or otherwise respond to the Complaint is
 November 21, 2023.
4. More than 20 similar lawsuits are pending in the United States District Court for
 Middle District of Tennessee, where they have been consolidated into *In re: HCA Healthcare Data
 Breach Litigation*, No. 23-CV-00684 (M.D. Tenn.) (the “Consolidated Case”). The parties have
 stipulated to the transfer of this action to the United States District Court for Middle District of

Tennessee so that this action can be consolidated with the Consolidated Case.

5. In the interest of efficiency and judicial economy, the parties agree to defer the deadline for HCA to file its response to the above-captioned complaint so that should this case be consolidated, HCA's response is filed and addressed in connection with the Consolidated Case.

6. The Parties therefore agree that (a) Defendant's response to the Complaint be deferred until 30 days from the date an order issues on the parties' stipulation to transfer and (b) should this case be consolidated, HCA will respond to the complaint in the Consolidated Case on the date set by the United States District Court for Middle District of Tennessee in the consolidated matter.

7. Based on the foregoing, the Parties agree that good cause exists for this extension.

8. This is this first request for an extension of time for Defendant to respond to the Complaint.

DATED this 14th day of November, 2023.

BAILEY ♦ KENNEDY

By: /s/ Joshua M. Dickey

JOSHUA M. DICKEY

PAUL C. WILLIAMS

Attorneys for Defendant HCA Healthcare, Inc.

DATED this 14th day of November, 2023.

KIND LAW

By: /s/ Michael Kind

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similarly situated*

IT IS SO ORDERED:



UNITED STATES DISTRICT JUDGE

DATED: November 16, 2023